BORNE CHEMICAL CO.

SAMPLING PLAN FOR TANK FARM

Figure 1 provides the location of the tanks. Most tanks appear to be open or vented or to have the porthole cracked. Those tanks which have closed portholes and are not vented, however, should be approached with extreme caution. Portholes should be opened carefully to minimize sparking. Borne Chemical Co. should develop a safety plan for its sampling team.

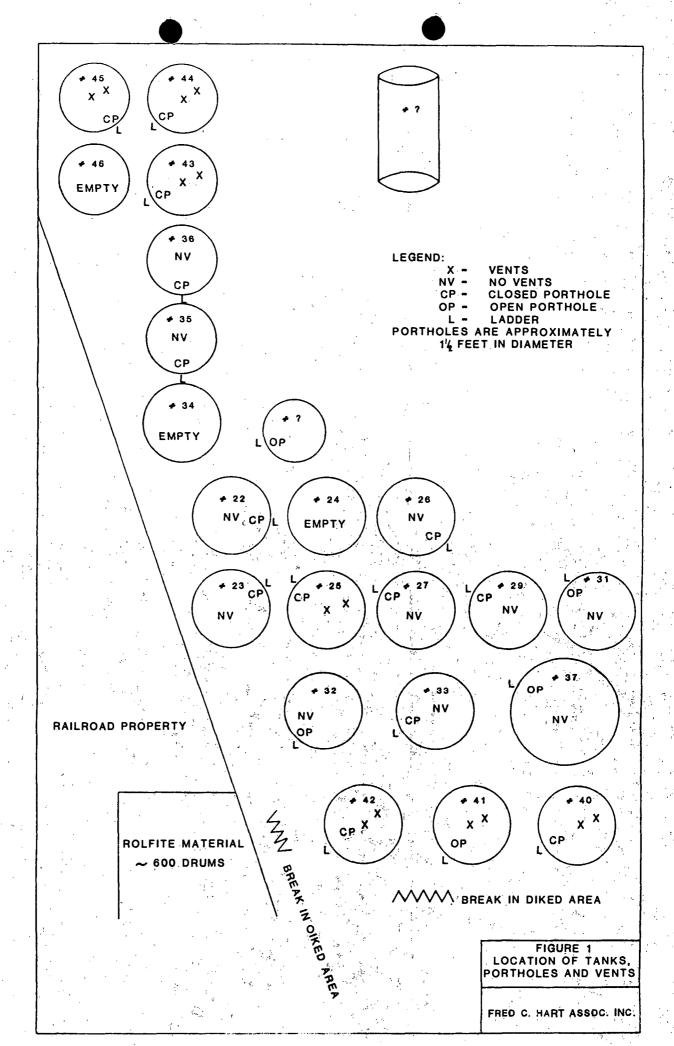
The fourteen tanks shown in Figure 2 should be sampled as follows:

- a) Determine the presence or absence of liquid using a high powered flashlight through the porthole. Take soundings to determine the height of the materials in the tank using a weighted rope marked in one foot sections.
- b) After determining the depth of materials take three samples: one shallow, one near the middle of the liquid and one near the bottom using a bomb sampler. Do not composite the samples from each tank. Sample all tanks including tanks with only sludge remaining. It is not necessary to clean the bomb sampler between depths but between tanks it must be cleaned with methylene chloride. The used methylene chloride must be drummed. Samples will be placed in eight-ounce glass jars with Teflon-lined tops which have been detergent and solvent washed. The remainder of the liquid in the sampler can be drummed or returned to the tank.

Tanks #24 and #34 are empty (per John Czapor). Tank #46 appeared empty from the bridge but should be sampled for sludge if any exists.

SCHEDULE OF ACTIVITIES AT BORNE CHEMICAL CO. SINCE 8/81

Date	Activity		
8/3/81	FIT preliminary site inspection. Delay in sampling recommended until colder weather.		
12/1/81	FIT begins preliminary planning and meetings for tank sampling. EPA tells FIT to put sampling plans on hold.		
1/25/82	FIT activity stopped by John Czapor due to Criminal Justice Department involvement.		
1/82	Valley Forge Engineering samples tanks #22, #27, #29, #32, #33, and #42. Samples split between NJDEP and Borne.		
.2/82	Discrepancies in PCB levels from two laboratories are found. NJDEP reports 1300 ppm; Borne analyses reports 10 ppm.		
3/82	Discrepancies resolved by EPA Chemist. Permission to broker tanks given to Borne Chemical. Flash points of tanks sampled in January found to be 180°F.		
3/31/82	FIT surveys portholes frbm Chessie System Railroad bridge.		
4/22/82	Hazelton Oil Co., Pennsylvania begins removal of materials from tanks #22, 29, 33 and 42. material from tank #27 will be removed tp Dupont.		
4/26/82	Local residents express concern over stored drums at site to Elizabeth Environmental Protection Department.		
5/-/82	State of Pennsylvania Department of Environmental Protection wants tanks retested before oil is manifested to their state.		



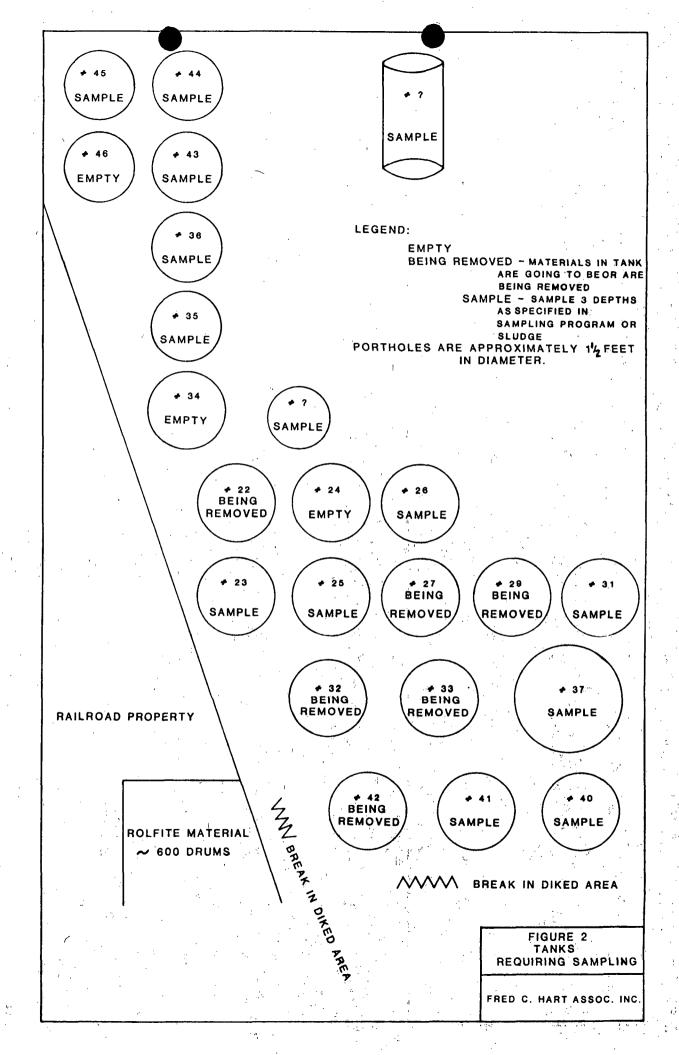


EXHIBIT II
BORNE CHEMICAL COMPANY, ING.
RESULTS OF OIL ANALYSES

C.C.L. CONTROL NUMBER	BORNE IDENTIFICATION	TYPE OF PCB PRESENT	LEVEL (PPM)
80-1296	. TK24 TOP		< 10*
80-1297	TK27 TOP	- ·	< 10*
80-1298**	TK32	A-1254	54,47
80-1325**	TK32, FIELD SAMPLED 9-19-80	A-1254	44,47
80-1299	TK22		< 10*
80-1300	TK29	A-1254	14
80-1303	TK42 TOP	A-1260	29
80-1304	TK33 TOP	A-1260 A-1254	12 18 T

^{*} NOT FOUND, LESS THAN NUMBER SHOWN WHICH IS THE DETECTION LIMIT.

** ANALYSES ON THESE SAMPLES WERE CONDUCTED IN DUPLICATE.

E: CASE CONSULTING LABORATORIES, INC.

